

ORIGINAL

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

KAI WEST,
a/k/a "IntelBroker,"
a/k/a "Kyle Northern,"

Defendant.

SEALED INDICTMENT

25 Cr.

25 CRIM 1341

COUNT ONE

(Conspiracy to Commit Computer Intrusions)

The Grand Jury charges:

1. From at least in or about December 2022 through at least in or about February 2025, in the Southern District of New York and elsewhere outside of the jurisdiction of any particular State or district of the United States, KAI WEST, a/k/a "IntelBroker," a/k/a "Kyle Northern," the defendant, and others known and unknown, at least one of whom is expected to be first brought to and arrested in the Southern District of New York, willfully and knowingly combined, conspired, confederated, and agreed together and with each other to commit offenses against the United States, to wit, a computer intrusion and intentionally causing damage to a computer system, in violation of Title 18, United States Code, Sections 1030(a)(2)(C), 1030(c)(2)(B)(i), 1030(c)(2)(B)(iii), 1030(a)(5)(A), 1030(c)(4)(B)(i), 1030(c)(4)(A)(i)(I), 1030(c)(4)(A)(i)(II), and 1030(c)(4)(A)(i)(VI).

2. It was a part and an object of the conspiracy that KAI WEST, a/k/a "IntelBroker," a/k/a "Kyle Northern," the defendant, and others known and unknown, knowingly, would and did access a protected computer without authorization, and exceed authorized access, and by means

of such conduct obtained, and attempted to obtain, information from a protected computer, which access (i) was committed for purposes of commercial advantage and private financial gain, and (ii) the value of the value of the information obtained exceeded \$5,000, in violation of Title 18, United States Code, Sections 1030(a)(2), 1030(c)(2)(B)(i), and 1030(c)(2)(B)(iii).

3. It was further a part and an object of the conspiracy that KAI WEST, a/k/a “IntelBroker,” a/k/a “Kyle Northern,” the defendant, and others known and unknown, knowingly would and did cause the transmission of a program, information, code, and command, and as a result of such conduct, would and did intentionally cause damage, without authorization, to a protected computer, which caused a loss, and would, if completed, have caused (i) a loss, (including loss resulting from a related course of conduct affecting one and more other protected computers) aggregating to at least \$5,000 in value to one and more persons during any one-year period, (ii) the modification and impairment, and potential modification and impairment, of the medical examination, diagnosis, treatment, or care of one or more individuals, and (iii) damage affecting 10 or more protected computers during any one-year period, in violation of Title 18, United States Code, Sections 1030(a)(5)(A), 1030(c)(4)(B)(i), 1030(c)(4)(A)(i)(I), 1030(c)(4)(A)(i)(II), and 1030(c)(4)(A)(i)(VI).

Overt Acts

a. On or about January 6, 2023, WEST and his co-conspirators exfiltrated data from a victim, and deleted files controlled by that victim, which caused at least \$5,000 in damage.

b. On or about January 6, 2023, WEST, using the IntelBroker username, offered for sale data stolen from a victim, which offer was transmitted via wires into the Southern District of New York and elsewhere.

c. On or about March 6, 2023, WEST and his co-conspirators exfiltrated patient data, including health care information, from a medical services provider and in so doing caused the modification or impairment, and potential modification or impairment, of patient medical care.

(Title 18, United States Code, Sections 371 and 3238.)

COUNT TWO
(Conspiracy to Commit Wire Fraud)

The Grand Jury further charges:

4. From at least in or about December 2022 through at least in or about February 2025, in the Southern District of New York and elsewhere outside of the jurisdiction of any particular State or district of the United States, KAI WEST, a/k/a “IntelBroker,” a/k/a “Kyle Northern,” the defendant, and others known and unknown, at least one of whom is expected to be first brought to and arrested in the Southern District of New York, willfully and knowingly combined, conspired, confederated, and agreed together and with each other to commit wire fraud, in violation of Title 18, United States Code, Section 1343.

5. It was a part and object of the conspiracy that KAI WEST, a/k/a “IntelBroker,” a/k/a “Kyle Northern,” the defendant, and others known and unknown, knowingly having devised and intending to devise a scheme and artifice to defraud and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, would and did transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, in violation of Title 18, United States Code, Section 1343, to wit, WEST and others engaged in a scheme to use fraudulent means to access, without authorization, computer

networks of victims, exfiltrate data from those networks, and sell that data for profit, which involved the use of interstate and foreign wires into and out of the Southern District of New York.

(Title 18, United States Code, Sections 1349 and 3238.)

COUNT THREE
(Accessing a Protected Computer to Obtain Information)

The Grand Jury further charges:

6. From at least in or about December 2022 through at least in or about June 2023, in the Southern District of New York and elsewhere outside of the jurisdiction of any particular State or district of the United States, KAI WEST, a/k/a “IntelBroker,” a/k/a “Kyle Northern,” the defendant, who is expected to be first brought to and arrested in the Southern District of New York, knowingly would and did access a protected computer without authorization, and exceed authorized access, and by means of such conduct obtained, and attempted to obtain, information from a protected computer, (i) which access was committed for purposes of commercial advantage and private financial gain, and (ii) the value of the information obtained exceeded \$5,000 , to wit, WEST intruded into, and aided and abetted, the intrusion of a victim’s computer system without authorization, exfiltrated data from that computer system, and sold, and attempted to sell, that data, using the IntelBroker username, on an online forum.

(Title 18, United States Code, Sections 1030(a)(2)(C), 1030(c)(2)(B)(i),
1030(c)(2)(B)(iii), 3238, and 2.)

COUNT FOUR
(Wire Fraud)

7. From at least in or about December 2022 through at least in or about February 2025, in the Southern District of New York and elsewhere outside of the jurisdiction of any particular State or district of the United States, KAI WEST, a/k/a “IntelBroker,” a/k/a “Kyle Northern,” the defendant, who is expected to be first brought to and arrested in the Southern District of New York,

the defendant, knowingly having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, transmitted and caused to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, to wit, WEST and others engaged in a scheme to use fraudulent means to access, without authorization, computer networks of victims, exfiltrate data from those networks, and sell that data for profit, which involved the use of interstate and foreign wires into and out of the Southern District of New York.

(Title 18, United States Code, Sections 1343, 3238, and 2.)

FORFEITURE ALLEGATIONS

8. As a result of committing the offenses alleged in Count One and Count Three of this Indictment, KAI WEST, a/k/a “IntelBroker,” a/k/a “Kyle Northern,” the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 1030(i), any and all property, real or personal, constituting or derived from, any proceeds obtained directly or indirectly, as a result of said offenses, and any and all personal property that was used or intended to be used to commit or to facilitate the commission of said offenses, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offenses.

9. As a result of committing the offenses alleged in Counts Two and Four of this Indictment, KAI WEST, a/k/a “IntelBroker,” a/k/a “Kyle Northern,” the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28 United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offenses, including but not limited to a

sum of money in United States currency representing the amount of proceeds traceable to the commission of said offenses.

Substitute Assets Provision

10. If any of the above described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided

without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 981, 1030;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)



FOREPERSON



MATTHEW PODOLSKY
Acting United States Attorney